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9 *Attorney for Plaintiff Adnan Ansar*
10 *and the Proposed Settlement Class*

11 **UNITED STATES DISTRICT COURT**
12 **CENTRAL DISTRICT OF CALIFORNIA**

13 **ADNAN ANSAR**, on behalf of himself
14 and all others similarly situated,

15 Plaintiff,

16 v.

17 **THE GILL CORPORATION**,

18 Defendant.

Case No. 2:24-cv-08875-MEMF-PD

Honorable Maame Ewusi-Mensah
Frimpong

**PLAINTIFF'S NOTICE OF
MOTION AND UNOPPOSED
MOTION FOR PRELIMINARY
APPROVAL**

Date: October 2, 2025

Time: 10:00 a.m. PT

Courtroom: Courtroom 8B

Complaint Filed: October 15, 2024

TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

PLEASE TAKE NOTICE that on October 2, 2025, at 10:00 a.m. PST, Plaintiff Adnan Ansar will move the Court for entry of an Order: (1) granting preliminary approval of the Settlement; (2) preliminarily certifying the Settlement Class for settlement purposes; (3) appointing Adnan Ansar as Class Representative; (4) appointing Strauss Borrelli PLLC as Class Counsel; (5) appointing Atticus Administration, LLC as Settlement Administrator; (6) approving the proposed Notice Plan; (7) approving the form and content of the Summary Notice (Exhibit E), Long Form Notice (Exhibit C), and Claim Form (Exhibit A); (8) approving the proposed Opt-Out and Objections procedures; and (9) scheduling a Final Approval Hearing—wherein the Court will consider final approval of the Settlement, final certification of the Settlement Class for settlement purposes, and any Motion for Attorney Fees, Costs, and Service Award.

Dated: August 22, 2025

Respectfully submitted,

By: /s/ Andrew G. Gunem

Andrew G. Gunem (SBN 354042)

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*Attorney for Plaintiff Adnan Ansar and
the Proposed Settlement Class*

CERTIFICATION OF COUNSEL

Pursuant to Local Rule 7-3, counsel for Plaintiffs certifies that they conferred with counsel for Defendant via e-mail on August 22, 2025.

DATED this 22nd day of August, 2025.

By: /s/ Andrew G. Gunem
Andrew G. Gunem

CERTIFICATE OF SERVICE

I, Andrew G. Gunem, hereby certify that on August 22, 2025, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to counsel of record, below, via the ECF system.

DATED this 22nd day of August, 2025.

By: /s/ Andrew G. Gunem
Andrew G. Gunem